REMARKS

Claims 1-3, 5-12, 16-19 and 21-23 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. 4,392,558 to *Heibel*. Claims 4, 13 and 15 have been allowed. Applicant believes the remaining claims to be in condition for allowance.

Claim 1 has been amended to include the limitations of claim 2 and claim 3, which have been respectively cancelled. In addition, claim 1 further requires, "said friction level arising from friction between said first hole and said first threaded member." Accordingly, as required by claim 1, the first threaded member is configured to stop rotation when the friction level arising from friction between the first hole and the first threaded member meets a predetermined threshold. This feature is not shown by *Heibel*. Therefore, claim 1, and its dependents, claims 5-9 and 21-22, stand in condition for allowance.

The Examiner further rejected claim 10 based on the same reference, *Heibel*. Claim 10 requires, "said second drive mechanism is configured to drive said brake actuator as a consequence of said brake engaging said brake actuator." *Heibel* does not disclose this feature. Applicant would draw the Examiner's attention to the specification of *Heibel* which states as follows:

> Continued rotation of shaft 1 causes tooth 25 of disc 11 to lift from pin 23 and spring 13 to wind up allowing annular member 33 to rotate relative to actuator member 3 and press clutch faces 51 and 53 together by a thrust bearing 47, locking annular member 21 in position relative to outer annular member 19. [*Heibel*, column 4, ll 30-36].

Therefore, from the above passage as well as the figures, it is clear that annular member 33 rotates as a consequence of tooth 25 of disc 11 lifting from pin 23 and spring 13 winding up. That is, when tooth 25 of disc 11 lifts from pin, annular member 33 is

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allowed to rotate relative to actuator member 3. It is thus this action, not engagement between brake and brake actuator, that causes element 33 to rotate. Therefore, claim 10 and its dependents, claims 11-12, 16-17 and 23, stand in condition for allowance.

For much the same reason, claim 18 is similarly allowable. This claim requires that a predetermined frictional threshold is reached created by a reaction force from the brake pad on the brake actuator. As indicated above, there is no reaction force from the brake pad on the brake actuator that causes a predetermined frictional threshold to be reached. Accordingly, claim 18 and its dependent, claim 19, stand in condition for allowance.

For the foregoing reasons, claims 1, 4-13, 15-19 and 21-23 all stand in condition for allowance.

Respectfully submitted,

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Dated: July 21, 2005

CERTIFICATE OF FACSIMILE

I hereby certify that this Amendment, Application Serial No. 10/614,582 is being facsimile transmitted to the Patent and Trademark Office (Fax No. (571) 273-8300) on July 21, 2005.

Theresa M. Palmateer

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